# CARGILL SALT DIVISION

7220 Central Ave.
Newark, CA 94560-4206
510/797-1820 1-800-321-1458
Fax: 510/790-8189

April 15, 1995

Mr. Steve Ritchie
CA Regional Water Quality Control Board
S.F. Bay Region
2101 Webster Street
Suite 500
Oakland, CA 94612

ATTENTION: Lila Tang

Dear Mr. Ritchie:

Please find attached the self-monitoring report for the NPDES Permit No. CA0028690 for our Redwood City facility wet weather discharge of rainwater from our salt crystallizer beds.

Discharge of rainwater from the crystallizer beds occurred March 10, 1995 to March 27, 1995. Approximately 329 acre feet of water was discharged to the First Slough in Redwood City. The field samples taken showed a range of Baume readings from 2.9-3.9 and a pH range of 8.2-8.5. The laboratory measurement of TDS was 30,000 ppm.

Slightly elevated levels of nickel and lead were found during this sampling period. Nickel was found at a concentration of 0.019 mg/l exceeding the limit of 0.0071 mg/l. Lead was found at a concentration of 0.0084 mg/l exceeding the limit of 0.0056 mg/l. We are continuing to investigate this issue, yet we are not sure what the cause of the elevated levels could be. This water is simply rainwater that falls on our crystallizer beds. We are willing to work with the RWQCB to resolve this matter.

"I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations [40 CFR 122.22(d)]"

Sincerely,

Barbara N. Ransom

Environmental Manager

Elevated No and Pb in

QUALITY CONTROL BOARD



cc: U.S. Environmental Protection Agency

#### b. COMPLIANCE EVALUATION SUMMARY

#### **Effluent Limitations**

1. The discharge of Waste No. 1 containing constituents in excess of the following limits is prohibited:

Constituents	<u>Units</u>	Maximum	Results
Total Dissolved Solids	mg/1	32,000	2.9-3.9 Be in field 30,000 ppm in Laboratory
Biochemical Oxygen Demand Five day	mg/l	20	<5 mg/l
Arsenic	μg/l	20	<0.004 mg/l
Cadmium	μg/I	10	<0.001 mg/l
Chromium (VI) <sup>a</sup>	μg/l	11	0.010 mg/l total chromium
Copper	μg/l	20	0.019 mg/l
Lead	μg/l	5.6	0.0084 mg/l
Mercury	μg/l	1	<0.0002 mg/l
Nickel	μg/l	7.1	0.018 mg/l
Silver	μg/l	2.3	<0.001 mg/i
Zinc	μg/l	58	0.033 mg/l

<sup>&</sup>lt;sup>a</sup> The Discharger may meet this limit as total chromium

#### Results

2. Waste No. 1 shall not have a pH less than 6.5 Ranor greater than 8.5 pH

Ranged between pH 8.2-8.5\* (field)

3. The survival of test fishes of the species <u>Menidia beryllina</u> or silverside minnow is a 96 hour static bioassay of the discharge of Waste No. 1 shall be a median of 90 percent survival and a 90 percentile value of not less than 70 percent survival.

Results: The results from the acute toxicity bioassy using <u>Menidia beryllina</u> as the test indicator species indicates that there was 95% survival in the 100% effluent sample after 96 hours.

<sup>\*</sup> The pH was read in the field throughout the discharge period. On two occasions the pH read 8.7 and 8.8. The discharge was immediately stopped and did not resume until pH was within limits.

APPENDIX C. MAP

CARGILL SALT

REDWOOD CITY



## APPENDIX D.

## LABORATORY DATA

## REPORT OF ACUTE BIOMONITORING TEST

## RAINWATER DISCHARGE FROM CRYSTALIZERS COLLECTED 10 MARCH, 1995

## REDWOOD CITY FACILITY

Prepared for

Cargill Salt Company 7220 Central Avenue Newark, CA 94560

Prepared by

S.R. Hansen & Associates 4085 Nelson Ave, Suite I Concord, Ca. 94520

## 1. INTRODUCTION

Beginning in February, 1992, S.R. Hansen & Associates began conducting static acute toxicity tests for the Cargill Salt Company in Newark, California as part of the compliance monitoring mandated in the facility's NPDES permit. This report describes the procedures used and the results obtained for acute toxicity tests and chemical analyses performed on a sample of Rainwater Discharged from the Crystallizers at the Redwood City facility between 09 - 10 March, 1995.

## 2. MATERIALS AND METHODS

Sample Collection - A 24-hr. composite sample of Rainwater Discharge from the Crystallizers at the Redwood City facility was collected by Cargill Salt Company staff on 09 - 10 March, 1995. The sample was stored in a pre-cleaned 2.5 gallon cubitainer, packed in an ice chest, and maintained at 4°C for transport to the S.R. Hansen & Associates (SRH&A) laboratory via SRH&A courier on 10 March, 1995. Toxicity tests were initiated on 11 March, 1995 (due to the availability of the test organisms).

Test Organisms - Acute bioassays were performed using *Menidia beryllina*. The *Menidia* were obtained from an outside supplier (Aquatic Indicators, St. Augustine, FL).

Toxicity Test Procedures - Menidia beryllina (10 days old) were obtained from Aquatic Indicators (St. Augustine, FL.) and were held in a five gallon aquarium prior to use in the tests. The animals were exposed to the effluent for a period of 96 hours under static, (renewal at 48 hours) conditions. The test was performed at a salinity of 29 ppt. One-liter beakers were used for the exposures, with a total volume of 500 ml of effluent sample added to each beaker. Arrowhead Spring Water (salinity adjusted to 29 ppt using artificial sea salts, Tropic Marin) was used as the control and diluent. Ten fish were placed into each container, and each exposure was run in duplicate. Temperature, dissolved oxygen, pH, electrical conductivity, salinity, and number of dead organisms were recorded daily in each exposure.

Chemical Test Procedures - Representative aliquots of the effluent were sent to Curtis & Tompkins, LTD (Berkeley, CA) and Quanterra Environmental Services (Sacramento, CA) for analyses. The sample that was to be analysed for metals was preserved with ultra-pure (Ultrex) nitric acid while the total dissolved solids and BOD samples remained unpreserved. Both samples were refrigerated to 4°C and shipped in a cooler with frozen blue ice to the contract labs via SRH&A and overnight couriers.

#### 3. RESULTS

The results of the acute toxicity tests and chemical analyses performed on the 09 March, 1995 Rainwater Discharge from the Redwood City Crystallizers are presented in Tables 1 and 2, respectively and can be summarized as follows:

## 3.1 ACUTE BIOASSAY TEST

The results from the acute toxicity bioassay using *Menidia beryllina* as the test indicator species indicates that there was 95% survival in the 100% effluent sample after 96 hours (Table 3-1). It should be noted that the 80% survival in the control treatments failed to meet the required 90% minimum for test acceptability.

## 3.2 CHEMICAL ANALYSES

Chemical analyses of the effluent sample that was discharged from the crystallizer between 09 - 10 March, 1995 indicate that five (5) of the metals that were analyzed (i.e., chromium, copper, lead, nickel, and zinc) and Total Dissolved Solids (TDS) were present in detectable concentrations (Table 3-2).

TABLE 3-1. RESULTS OF 96-HR MENIDIA BERYLLINA BIOASSAY ON RAINWATER DISCHARGE FROM THE CARGILL SALT COMPANY REDWOOD CITY FACILITY CRYSTALIZERS (COLLECTED 09-10 MARCH, 1995)

Concentration	% Su	rvival	
(% Effluent)	Replicate A	Replicate B	AVERAGE
100	100	90	95
50	80	100	90
25	. 90	80	85
10	90	70	80
5	80	80	80
Control	90	. 70	80

TABLE 3-2. RESULTS OF CHEMICAL ANALYSES PERFORMED ON RAINWATER DISCHARGE FROM THE CARGILL SALT COMPANY REDWOOD CITY FACILITY CRYSTALIZERS (COLLECTED 09-10 MARCH, 1995)

ANALYSIS	CONCENTRATION (mg/L)	DISCHARGE LIMIT (mg/L)
Total Dissolved Solids (EPA 160.1)	30,000	32,000
BOD (EPA 405.1)	<5.0	20
Arsenic (Method 6020-M)	< 0.004	0.020
Cadmium (Method 6020-M)	< 0.001	0.010
Chromium (Method 6020-M)	0.010	0.011
Copper (Method 6020-M)	0.019	0.020
Lead (Method 6020-M)	0.0084*	0.0056
Mercury (Method 245.1)	< 0.00020	0.001
Nickel (Method 6020-M)	0.018*	0.0071
Silver (Method 6020-M)	< 0.001	0.0023
Zinc (Method 6020-M)	0.033	0.058

<sup>\* -</sup> Exceeds discharge limit

## 4. CONCLUSIONS

The results of the tests performed on the sample that that was discharged from the crystallizers at the Redwood City facility indicate that only nickel and lead were present in concentrations which exceeded the limits of the discharge permit.

It should be noted that control survival (80%) failed to meet the minimum requirements of 90% for acceptability of an acute test. However, since there was no apparent toxicity in the 100% effluent sample, it appears that the fish were responding to the control/diluent water.

Data sheets for these bioassay tests are provided in the Appendix to this report.

## **APPENDIX**

LABORATORY DATA SHEETS

## S.R. HANSEN & ASSOCIATES

## ACUTE TEST DATA SHEET

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## S.R. HANSEN & ASSOCIATES

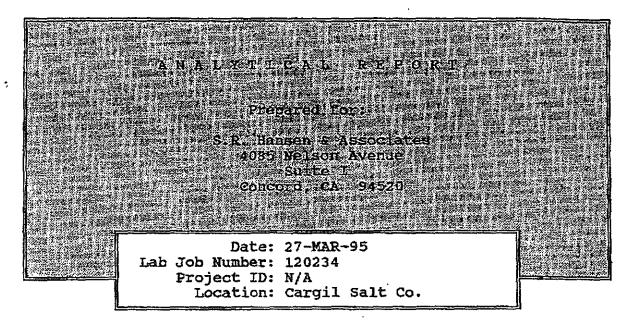
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## Curtis & Tompkins, Ltd., Analytical Laboratories. Since 1878

2323 Fifth Street, 8erkeley, CA 94710, Phone (510) 486-0900



Reviewed by:

Reviewed by:

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Berkeley

LABORATORY NUMBER: 120234

CLIENT: S.R. Hansen & Associates

LOCATION: Cargill Salt Co.

DATE SAMPLED: 03/11/95
DATE RECEIVED: 03/13/95
DATE ANALYZED: 03/14/95
DATE REPORTED: 03/27/95

ANALYSIS: TOTAL DISSOLVED SOLIDS

ANALYSIS METHOD: EPA 160.1

LAB ID	SAMPLE ID	RESULT	UNITS	REPORTING LIMIT
120234-001	R.W.C. CRYSTALLIZER	30.000	ma/L	90

ND = Not detected at or above reporting limit.

QA/QC SUMMARY: Duplicate of 120203-005

RPD, %



LABORATORY NUMBER: 120234

CLIENT: S.R. Hansen & Associates

LOCATION: Cargill Salt Co.

DATE SAMPLED: 03/11/95
DATE RECEIVED: 03/13/95
DATE ANALYZED: 03/13-18/95
DATE REPORTED: 03/27/95

ANALYSIS: BIOCHEMICAL OXYGEN DEMAND

ANALYSIS METHOD: EPA 405.1.

LAB ID	SAMPLE	ID	RESULT	UNITS	REPORTING LIMIT
120234-001	R.W.C.	CRYSTALLIZER	ИD	mg/L	5.0
METHOD BLAN	K N/A		ND	mg/L	5.0

ND = Not detected at or above reporting limit.

QA/QC SUMMARY: BS

RECOVERY, %



Quanterra Incorporated 880 Riverside Parkway West Sacramento, California 95605

916 373-5600 Telephone 916 372-1059 Fax

March 20, 1995

QUANTERRA PROJECT NUMBER: 080873

PO/CONTRACT: FRONT

Gary Wortham S.R. Hansen & Associates 4085 Nelson Avenue, Suite I Concord, CA 94520

Dear Mr. Wortham:

This report contains the analytical results for the two aqueous samples which were received under chain of custody by Quanterra Environmental Services on 16 March 1995. These samples are associated with your Cargill Salt Company project.

The case narrative is an integral part of this report.

Preliminary results were forwarded via facsimile on 20 March 1995.

If you have any questions, please call me at (916) 374-4357.

Sincerely,

David J. Herbert Project Manager

DJH/jas

**Enclosures** 



## TABLE OF CONTENTS

## **QUANTERRA PROJECT NUMBER 080873**

Case Narrative

Quanterra's Quality Assurance Program

Sample Description Information

Chain of Custody Documentation

Selected Metals - Various Methods

Includes Samples: 1, 2

Sample Data Sheets Method Blank Report

Laboratory Control Sample Report (DCS)



# CASE NARRATIVE QUANTERRA PROJECT NUMBER 080873

There were no anomalies associated with this report.



## QUANTERRA'S QUALITY ASSURANCE PROGRAM

Quanterra has implemented an extensive Quality Assurance (QA) program to ensure the production of scientifically sound, legally defensible data of known documentable quality. A key element of this program is Quanterra's Laboratory Control Sample (LCS) system. Controlling lab operations with LCS (as opposed to matrix spike/matrix spike duplicate samples), allows the lab to differentiate between bias as a result of procedural errors versus bias due to matrix effects. The analyst can then identify and implement the appropriate corrective actions at the bench level, without waiting for extensive senior level review or costly and time-consuming sample re-analyses. The LCS program also provides our client with information to assess batch, and overall laboratory performance.

#### **Laboratory Control Samples - (LCS)**

Laboratory Control Samples (LCS) are well-characterized, laboratory generated samples used to monitor the laboratory's day-to-day performance of routine analytical methods. The results of the LCS are compared to well-defined laboratory acceptance criteria to determine whether the laboratory system is "in control". Three types of LCS are routinely analyzed: Duplicate Control Samples (DCS), Single Control Samples (SCS), and method blanks. Each of these LCS are described below.

Duplicate Control Samples. A DCS is a well-characterized matrix (blank water, sand, sodium sulfate or celite) which is spiked with certain target parameters and analyzed at approximately 10% of the sample load in order to establish method-specific control limits.

Single Control Samples. An SCS consists of a control matrix that is spiked with surrogate compounds appropriate to the method being used. In cases where no surrogate is available, (e.g. metals or conventional analyses) a single control sample identical to the DCS serves as the control sample. An SCS is prepared for each sample lot. Accuracy is calculated identically to the DCS.

Method Blank Results. A method blank is a laboratory-generated sample which assesses the degree to which laboratory operations and procedures cause false-positive analytical results for your samples.



# SAMPLE DESCRIPTION INFORMATION for S.R. Hansen & Associates

			Sampl	Received		
Lab ID	Client ID	Matrix	Date	Time	Date	
080873-0001-SA 080873-0002-SA		AQUEOUS AQUEOUS	15 MAR 99 15 MAR 99		16 MAR 95 16 MAR 95	

## CHAIN OF CUSTODY RECORD

PROJECT NAM						
SAMPLERS: (SI	Cargill GNATURE) (ou	)				
DATE	TIME	COMPOSITE/ GRAB	SITE LOCATION	#/SIZE OF CONTAINERS	TYPE OF ANALYSIS	PRESERVATIVE/ COMMENTS
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## CHAIN OF CUSTODY RECORD

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Selected Metals - Various Methods



#### **METALS**

(Water - Total)

Client Name: S.R. Hansen & Associates Client ID: Redwood City Crystallizer Lab ID: 080873-0002-SA

Matrix: AQUEOUS Authorized: 16 MAR 95 Sampled: 15 MAR 95 Prepared: See Below Received: 16 MAR 95 Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Arsenic Cadmium Chromium Copper Lead Mercury Nickel Silver Zinc	ND 0.010 0.019 0.0084 ND 0.018 ND 0.033	mg/L mg/L mg/L mg/L mg/L mg/L mg/L	0.0040 0.0010 0.0010 0.0010 0.0010 0.00020 0.0010 0.0020	6020-M 6020-M 6020-M 6020-M 6020-M 245.1 6020-M 6020-M 6020-M	16 MAR 95 16 MAR 95 16 MAR 95 16 MAR 95 16 MAR 95 16 MAR 95 16 MAR 95	17 MAR 95 17 MAR 95 17 MAR 95 17 MAR 95 17 MAR 95 17 MAR 95 17 MAR 95

ND = Not detected NA = Not applicable

Reported By: John Barnett

Approved By: Lee Mao

The cover letter is an integral part of this report.

Rev 230787





#### **METALS**

(Water - Total)

Client Name: S.R. Hansen & Associates Client ID: Lab ID: 080873-0002-SA

Lab ID: 080873-0002-SA Matrix: AQUEOUS Authorized: 16 MAR 95

Sampled: 15 MAR 95 Prepared: See Below

Received: 16 MAR 95 Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Arsenic Cadmium Chromium Copper Lead Mercury Nickel Silver Zinc	ND ND 0.010 0.019 0.0084 ND 0.018 ND 0.033	mg/L mg/L mg/L mg/L mg/L mg/L mg/L	0.0040 0.0010 0.0010 0.0010 0.0010 0.00020 0.0010 0.0020	6020-M 6020-M 6020-M 6020-M 245.1 6020-M 6020-M 6020-M	16 MAR 95 16 MAR 95 16 MAR 95 16 MAR 95 16 MAR 95 16 MAR 95 16 MAR 95	5 17 MAR 95 17 MAR 95 17 MAR 95 17 MAR 95 17 MAR 95 17 MAR 95 17 MAR 95

ND = Not detected NA = Not applicable

Reported By: John Barnett

Approved By: Lee Mao

The cover letter is an integral part of this report.

Rev 230787



## QC LOT ASSIGNMENT REPORT Metals Analysis and Preparation

Laboratory Sample Number	QC Matrix	QC Category	QC Lot Number (DCS)	QC Run Number (SCS/BLANK)
080873-0001-SA	AQUEOUS	6020-M-AT	16 MAR 95-T	16 MAR 95-T
080873-0001-SA	AQUEOUS	HG-CVAA-A	16 MAR 95-T	16 MAR 95-T
080873-0002-SA	AQUEOUS	6020-M-AT	16 MAR 95-T	16 MAR 95-T
080873-0002-SA	AQUEOUS	HG-CVAA-A	16 MAR 95-T	16 MAR 95-T



METHOD BLANK REPORT Metals Analysis and Preparation Project: 080873

ICPMS AALIST (As, Pb, Se, T1, Sb, Cd, Cr, Cu, Ni, Ag,

6020-AALIST-AT AQUEOUS Test:

Matrix:

QC Lot: 16 MAR 95-T QC Run: 16 MAR 95-T

QC LOC. 10 IMR 30	10 IMR 30 1 Q0 Nam. 10 IMR 33 1							
Analyte	Result	Units	Reporting Limit					
Arsenic Cadmium Chromium Copper Lead Nickel Silver Zinc	ND ND ND ND ND ND ND ND	mg/L mg/L mg/L mg/L mg/L mg/L mg/L	0.0040 0.0010 0.0010 0.0010 0.0010 0.0010 0.0020					

HG-CVAA-AT Test:

Mercury, Cold Vapor AA (Total)

**AQUEOUS** Matrix:

QC Lot: 16 MAR 95-T QC Run: 16 MAR 95-T

Reporting Limit Result Units Analyte Mercury ND mg/L 0.00020



DUPLICATE CONTROL SAMPLE REPORT Metals Analysis and Preparation Project: 080873

QC Lot:

Concentration Units: mg/L

Analyte	Spiked		ration- Measure DCS2			uracy rage(%) Limits	(R	ision PD) Limit
Arsenic Cadmium Chromium Copper Lead Nickel Silver Zinc	0.200 0.200 0.200 0.200 0.200 0.200 0.200	0.178 0.185 0.191 0.185 0.197 0.186 0.198 0.170	0.177 0.186 0.194 0.187 0.196 0.187 0.198 0.173	0.178 0.186 0.192 0.186 0.196 0.186 0.198 0.172	89 93 96 93 98 99 86	80-120 80-120 80-120 80-120 80-120 80-120 80-120 80-120	0.5 0.5 1.6 1.1 0.5 0.5 0.0	20 20 20 20 20 20 20 20

Category: HG-CVAA-A Mercury by CVAA Matrix: AQUEOUS QC Lot: 16 MAR 95-T Concentration Units: mg/L

Analyte	Spiked	DCS1	ration Measured DCS2	d AVG	Acc Ave DCS	uracy rage(%) Limits	Preci (RI DCS I	ision PD) Limit
Mercury	0.0010	0.0010	0.0010	0.0010	107	80-119	0.7	14

Calculations are performed before rounding to avoid round-off errors in calculated result

e. EFFLUENT DATA SUMMARY
Not Applicable
f. LIST OF APPROVED ANALYSES
Not Applicable
g. FLOW DATA
Total Water Discharged 329 acre feet